

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ANGEL LYNNE MARTIN,	:	
Individually and as Administrator of	:	CIVIL ACTION 4:15-CV-02034-MWB
of the Estate of Howard Edward	:	
Martin, Jr.,	:	
	:	
	:	
v.	:	
	:	
NORFOLK SOUTHERN	:	
CORPORATION, d/b/a NORFOLK	:	
SOUTHERN RAILWAY	:	
COMPANY, TODD MICHAEL	:	
BUBNIS, JAMES ERNEST	:	
MOFFETT and	:	
	:	
CLINTON TOWNSHIP and	:	
LYCOMING COUNTY	:	

ANSWER OF NORFOLK SOUTHERN CORPORATION,
d/b/a NORFOLK SOUTHERN RAILWAY COMPANY,
TODD M. BUBNIS AND JAMES E. MOFFETT, DEFENDANTS
TO THE CROSS-CLAIM OF CLINTON TOWNSHIP

AND NOW comes Norfolk Southern Corporation, d/b/a Norfolk Southern Railway Company, Todd M. Bubnis And James E. Moffett, Defendants, (“Railroad Defendants”), by their attorneys, NAUMAN, SMITH, SHISSLER & HALL, LLP, and file the following Answer to the Cross-Claim of Clinton Township:

**DEFENDANT CLINTON TOWNSHIP’S CROSS-CLAIM
FOR CONTRIBUTION AND/OR INDEMNIFICATION AGAINST
DEFENDANTS NORFOLK SOUTHERN CORPORATION, d/b/a
NORFOLK SOUTHERN RAILWAY COMPANY, TODD
MICHAEL BUBNIS, JAMES ERNEST MOFFETT, AND
LYCOMING COUNTY**

1. Railroad Defendants herein incorporate by reference the answers, affirmative defenses and cross-claims set forth in their Answer to Plaintiff’s Complaint as if fully set forth herein.

2. The averments of paragraph 2 are denied as legal conclusions. By way of further answer, it is denied that Railroad Defendants are in any way liable to Plaintiff, jointly or severally liable with, or liable over to Defendant Clinton Township for indemnity and/or contribution or otherwise.

WHEREFORE, Norfolk Southern Corporation, d/b/a Norfolk Southern Railway Company, Todd M. Bubnis And James E. Moffett, Defendants, demand judgment in their favor and against Clinton Township as to any and all claims set forth in its Cross-claim.

NAUMAN, SMITH, SHISSLER & HALL, LLP

By: s/Craig J. Staudenmaier, Esquire
Craig J. Staudenmaier, Esquire
Supreme Court ID# 34996

Joshua D. Bonn, Esquire
Supreme Court ID# 93967

200 North Third Street, 18th Floor
P. O. Box 840
Harrisburg, PA 17108-0840
Counsel for Norfolk Southern Corporation,
d/b/a Norfolk Southern Railway Company,
Todd M. Bubnis And James E. Moffett,
Defendants

CERTIFICATE OF SERVICE

AND NOW, on the date stated below, I, **Judy A. Imes**, an employee of Nauman, Smith, Shissler & Hall, LLP, hereby certify that I this day served the foregoing “Answer of Norfolk Southern Corporation, d/b/a Norfolk Southern Railway Company, Todd M. Bubnis and James E. Moffett, Defendants, to the Cross-Claim of Clinton Township, ” by electronic filing and/or by United States mail, first class, postage prepaid, at Harrisburg, Pennsylvania, addressed to the following:

Jeffrey A. Krawitz, Esquire
Michael C. Ksiazek, Esquire
Edward Shensky, Esquire
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/s Judy A. Imes
Judy A. Imes

Date: January 6, 2015